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SOLUTIONS*

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

GENA HANSON, individually and on behalf of)
all others similarly situated,)
)
Plaintiff,)
)
v.)
)
JQD, LLC, d/b/a PRO SOLUTIONS, a)
California corporation;)
)
Defendant.)

Case No. 4:13-cv-05377-RS

**JOINT STIPULATION AND ~~[PROPOSED]~~
ORDER TO EXTEND CLASS NOTICE
DEADLINES AND MOVE FINAL
APPROVAL HEARING**

Courtroom: 3
Judge: Hon. Richard Seeborg

1 WHEREAS, pursuant to the Court's Order Granting Preliminary Approval of Settlement
2 ("Preliminary Approval Order"), Defendant Pro Solutions (Defendant) was required to provide the
3 claims administrator with specific data regarding the class members by no later than November 12,
4 2016;

5 WHEREAS, pursuant to the Court's Preliminary Approval Order, the claims administrator was
6 required to mail notice postcards to the class members by no later than November 22, 2016;

7 WHEREAS, Defendant fulfilled its obligation and provided the claims administrator with the
8 required class member data on or before November 12, 2016 ("Class Notice Deadline");

9 WHEREAS, the class member data that Defendant provided to the claims administrator was
10 larger than anticipated and contained certain data fields that were not self-explanatory, which in turn
11 required the claims administrator to dedicate more time and effort than originally anticipated to process
12 the data and identify the proper class members for notice;

13 WHEREAS, the claims administrator worked diligently with the Parties in an attempt to meet
14 the November 22, 2016 Class Notice Deadline but ultimately determined that more time was needed to
15 adequately process the data and identify the appropriate class members for notice;

16 WHEREAS, due to the unforeseen events described above, the parties now stipulate and
17 request that the Court enter an order extending the Class Notice Deadline and all other related
18 deadlines;

19 NOW, THEREFORE, the Parties hereby STIPULATE that the Court enter an order amending
20 the Court's Preliminary Approval Order of October 18, 2016 (Docket No. 80), as follows:

21 (1) Extending the Class Notice Deadline to thirty (30) days from the date the Court enters an
22 order approving this STIPULATION;

23 (2) Extending the deadline for class counsel to file its application for attorney's fees and
24 expenses to sixty (60) days from the date the Court enters an order approving this STIPULATION;

25 (3) Extending the deadline for class members to submit their claims or requests for exclusion to
26 seventy-five (75) days from the date the Court enters an order approving this STIPULATION;

27 (4) Extending the deadline for filing the motion in support of final approval to eighty-eight (88)
28 days from the date the Court enters an order approving this STIPULATION; and

(5) Moving the final approval hearing date to the first Thursday falling one hundred and twenty-three (123) days from the date the Court enters an order approving this STIPULATION.

Respectfully submitted,

Dated: December 19, 2016

COTCHETT, PITRE & McCARTHY, LLP

By: /s/ Justin T. Berger

JUSTIN T. BERGER

EMANUEL B. TOWNSEND

HOUSING AND ECONOMIC RIGHTS ADVOCATES

NOAH ZINNER

GINA DI GIUSTO

Attorneys for Plaintiff and the Proposed Class

Dated: December 19, 2016

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/ Stephen H. Turner

STEPHEN H. TURNER

*Attorneys for Defendant JQD, LLC d/b/a
PRO SOLUTIONS*

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~~PROPOSED~~ ORDER

Pursuant to the STIPULATION of the Parties, it is hereby ordered that the Court's October 18, 2016 Order Granting Preliminary Approval of Settlement ("Preliminary Approval Order") (Docket No. 80) is amended as follows:

(1) The Class Notice Deadline shall be thirty (30) days from the date of entry of this order;

(2) The deadline for class counsel to file its application for attorney's fees and expenses shall be sixty (60) days from the date of entry of this order;

(3) The deadline for class members to submit their claims or requests for exclusion shall be seventy-five (75) days from the date of entry of this order;


(4) The deadline for filing the motion in support of final approval shall be eighty-eight (88) days from the date of entry of this order; and

(5) The final approval hearing shall take place on the first Thursday that falls one hundred and twenty-three (123) days from the date of entry of this order. Final Approval Hearing 4/27/2017 at 1:30 p.m.

In all other respects, the Court's Preliminary Approval Order remains in full force and effect.

IT IS SO ORDERED.

DATED: 12/20/16


HON. RICHARD SEEBOLD
UNITED STATES DISTRICT COURT